

EXHIBIT 1

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTONRONALD E. DOYLE (Pl. Jr.)

Plaintiff(s)

vs.

LOUIS VUITTON USA, INC.

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2020 -CP- 10 - 5023Submitted By: RONALD E. DOYLE
Address: 2017 SHIELDS LANE
MOUNT PLEASANT, SC 29466
(843) 301-3027

SC Bar #:

Telephone #: 843-301-3027

Fax #:

Other:

E-mail: rdoyl@oklawyer4u.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. **This form is NOT required to be filed in E-Filed Cases.**

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
☐ This case is subject to **ARBITRATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☒ This case is subject to **MEDIATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|---|--|---|---|
| Contracts
<input type="checkbox"/> Constructions (100)
<input type="checkbox"/> Debt Collection (110)
<input type="checkbox"/> General (130)
<input type="checkbox"/> Breach of Contract (140)
<input type="checkbox"/> Fraud/Bad Faith (150)
<input type="checkbox"/> Failure to Deliver/Warranty (160)
<input type="checkbox"/> Employment Discrim (170)
<input type="checkbox"/> Employment (180)
<input checked="" type="checkbox"/> Other (199) <u>DISABILITY DISCR.</u>
Inmate Petitions
<input type="checkbox"/> PCR (500)
<input type="checkbox"/> Mandamus (520)
<input type="checkbox"/> Habeas Corpus (530)
<input type="checkbox"/> Other (599)

Special/Complex /Other
<input type="checkbox"/> Environmental (600)
<input type="checkbox"/> Automobile Arb. (610)
<input type="checkbox"/> Medical (620)
<input type="checkbox"/> Other (699)
<input type="checkbox"/> Sexual Predator (510)
<input type="checkbox"/> Permanent Restraining Order (680)
<input type="checkbox"/> Interpleader (690) | Torts - Professional Malpractice
<input type="checkbox"/> Dental Malpractice (200)
<input type="checkbox"/> Legal Malpractice (210)
<input type="checkbox"/> Medical Malpractice (220)
Previous Notice of Intent Case #
<u>20 -NI- -</u>
<input type="checkbox"/> Notice/ File Med Mal (230)
<input type="checkbox"/> Other (299)

Administrative Law/Relief
<input type="checkbox"/> Reinstate Drv. License (800)
<input type="checkbox"/> Judicial Review (810)
<input type="checkbox"/> Relief (820)
<input type="checkbox"/> Permanent Injunction (830)
<input type="checkbox"/> Forfeiture-Petition (840)
<input type="checkbox"/> Forfeiture-Consent Order (850)
<input type="checkbox"/> Other (899)

<input type="checkbox"/> Pharmaceuticals (630)
<input type="checkbox"/> Unfair Trade Practices (640)
<input type="checkbox"/> Out-of State Depositions (650)
<input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660)
<input type="checkbox"/> Pre-Suit Discovery (670) | Torts - Personal Injury
<input type="checkbox"/> Conversion (310)
<input type="checkbox"/> Motor Vehicle Accident (320)
<input type="checkbox"/> Premises Liability (330)
<input type="checkbox"/> Products Liability (340)
<input type="checkbox"/> Personal Injury (350)
<input type="checkbox"/> Wrongful Death (360)
<input type="checkbox"/> Assault/Battery (370)
<input type="checkbox"/> Slander/Libel (380)
<input type="checkbox"/> Other (399)

Judgments/Settlements
<input type="checkbox"/> Death Settlement (700)
<input type="checkbox"/> Foreign Judgment (710)
<input type="checkbox"/> Magistrate's Judgment (720)
<input type="checkbox"/> Minor Settlement (730)
<input type="checkbox"/> Transcript Judgment (740)
<input type="checkbox"/> Lis Pendens (750)
<input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)
<input type="checkbox"/> Confession of Judgment (770)
<input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)
<input type="checkbox"/> Incapacitated Adult Settlement (790)
<input type="checkbox"/> Other (799) | Real Property
<input type="checkbox"/> Claim & Delivery (400)
<input type="checkbox"/> Condemnation (410)
<input type="checkbox"/> Foreclosure (420)
<input type="checkbox"/> Mechanic's Lien (430)
<input type="checkbox"/> Partition (440)
<input type="checkbox"/> Possession (450)
<input type="checkbox"/> Building Code Violation (460)
<input type="checkbox"/> Other (499)

Appeals
<input type="checkbox"/> Arbitration (900)
<input type="checkbox"/> Magistrate-Civil (910)
<input type="checkbox"/> Magistrate-Criminal (920)
<input type="checkbox"/> Municipal (930)
<input type="checkbox"/> Probate Court (940)
<input type="checkbox"/> SCDOT (950)
<input type="checkbox"/> Worker's Comp (960)
<input type="checkbox"/> Zoning Board (970)
<input type="checkbox"/> Public Service Comm. (990)
<input type="checkbox"/> Employment Security Comm (991)
<input type="checkbox"/> Other (999) |
|---|--|---|---|

Submitting Party Signature: [Signature]Date: 10.27.2020

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCF, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

STATE OF SOUTH CAROLINA,

COUNTY OF CHARLESTONRONALD E. DOYLE (PRO SE)

Plaintiff,

vs.

LOUIS VUITTON USA, INC.

Defendant.

IN THE COURT OF COMMON PLEAS

SUMMONS

FILE NO. 2020 -CP-10 - 5023

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

CHARLESTON, South Carolina

R. E. Doyle (Pro Se)
Plaintiff/Attorney for Plaintiff

Dated: 10.27.2020Address: 2017 SHIELDS LANE, MT. PLEASANT, SC 29466

REGISTERED AGENT:
CORPORATION SERVICE CO.
508 MEETING ST.
WEST COLUMBIA, SC
29169

FILED
2020 NOV 17 AM 12:16
J. J. ARMSTRONG
CLERK OF COURT

SCCA 401 (5/02)

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS

Ronald E. Doyle,)

Plaintiff,)

v.)

2020-CP-10 - 6023

Louis Vuitton USA, Inc.)
A Delaware Corporation)

Defendant.)

REGISTERED AGENT:

CORPORATION SERVICE COMPANY
508 Meeting Street
West Columbia, SC 29169

2020 NOV 17 AM 12:16
JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

FILED

COMPLAINT

Comes Now Plaintiff, Ronald E. Doyle, and for his cause of action states the following:

1. Plaintiff is a resident of South Carolina;
2. Defendant, Louis Vuitton USA, Inc., is a foreign corporation, licensed in the State of Delaware with a retail outlet in Charleston, SC and online/e-commerce sales throughout South Carolina;
3. Plaintiff is a member of a protected class, a disabled individual as defined by the Americans With Disabilities Act of 1990 42 U.S.C. 126 § 12101 et seq.;
4. Defendant is aware of Plaintiff's specific disabilities and has been aware at all times relevant to this action;
5. Plaintiff is a substantial consumer of Defendant's exclusive products, goods and services;

6. Defendant maintains a sizable e-commerce internet presence which offers the Defendant's exclusive luxury goods, products and services for sale to the general public;
7. Plaintiff's disabilities constrain in-person shopping at Defendant's retail outlet forcing Plaintiff into a compromised situation by requiring his utilization of in-store commerce and greatly and dangerously exacerbating Plaintiff's disabilities and increasing danger to Plaintiff and others.
8. Plaintiff utilized Defendant's on-line shopping opportunities to purchase several products and goods on October 10, 2019; October 16, 2019; and, October 18, 2019;
9. Plaintiff experienced problems with the goods delivered and problems with missing goods;
10. Plaintiff made a good faith effort to resolve the problems/issues with the Defendant/merchant to no avail;
11. Plaintiff subsequently, pursuant to statutory rights granted by the Truth In Lending Act, 15 U.S.C. § 1635 et seq. as implemented by Regulation Z, 12 C.F.R., Part 226, specifically, § 226.12(c), and disputed a portion of the charges for the goods billed on Plaintiff's Platinum American Express™ credit card;
12. In a discriminatory, retaliatory and deliberate action, Plaintiff was placed on Defendant's internet "no-sales" list for exercising his statutory rights to dispute the pertinent erroneous charges;
13. Plaintiff is prohibited from access to Defendant's website e-commerce purchasing platform simply for causing a temporary "chargeback," although the ultimate result was a mutually satisfactory resolution and Defendant suffered no financial loss;
14. Plaintiff alleges discrimination involving public accommodations by Defendant's intentional, capricious actions in blocking Plaintiff's rightful access to its sales website in violation of South Carolina's Bill of Rights for Handicapped Persons, 43-33-510, et seq. and the Americans With Disability Act of 1990;
15. Plaintiff reserves the right to amend the pleadings to include as Plaintiffs, *Those Similarly Situated*, upon discovery which will more likely than not expose a pattern and practice of this discriminatory and unconscionable conduct by Defendant.

Plaintiff respectfully requests equitable relief in the form of a Court Order requiring Defendant to remove any and all barriers to web accessibility for disabled persons as permissible by virtue of 42 U.S.C. § 2003a-3(a) and S.C. 43-33-560 and provide public notice of the removal of this barrier to web access commerce for those individuals identifying as disabled by the ADA or applicable state accessibility laws.

Additionally, Plaintiff prays for five thousand dollars (\$5,000) in actual damages, plus attorney's fees and the costs associated with bringing forth this action.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'RD', is written over a horizontal dashed line.

Ronald E. Doyle (*Pro Se*)
2017 Shields Lane
Mount Pleasant, SC 29466
(843) 301-3027

Date: November 10, 2020



Office of the Sheriff
LEXINGTON COUNTY

Bryan "Jay" Koon

2020 DEC -8 PM 2:07
JULIE J. AUSTIN
CLERK OF COURT

FILED

State Of SOUTH CAROLINA)
COUNTY OF LEXINGTON) Affidavit of Service

Case #:2020CP1005023

RONALD E DOYLE

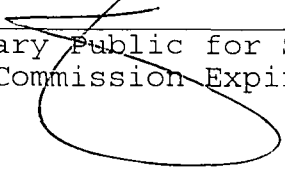
-VS-

LOUIS VUITTON INC

The undersigned, being duly sworn, says on oath that he/she served the DISCOVERY REQUESTS in this action by delivering same to: AGENT FOR SERVICE, SAVANNAH POPE PERSONAL SERVICE And leaving with him/her one copy of same at 508 MEETING ST WEST COLUMBIA SC 29169 on the 1 of December, 2020 at 14:15 Hrs. And that Defendant/Respondent is not a member of the U.S. Forces.

Signed 
NATHANIEL COLLINS, SERGEANT, LCSD

Sworn to before me on this
2 day of December, 2020


Notary Public for South Carolina
My Commission Expires: 2.25.24





Office of the Sheriff
LEXINGTON COUNTY

Bryan "Jay" Koon

2020 DEC -8 PM 2:07
JULIE J. ANDERSON
CLERK OF COURT

State Of SOUTH CAROLINA)
COUNTY OF LEXINGTON)

Affidavit of Service

Case #:2020CP1005023

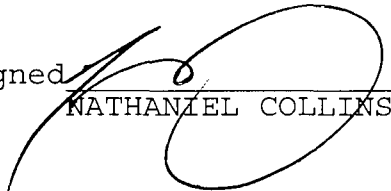
RONALD E DOYLE

-VS-

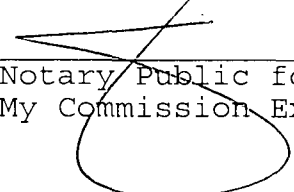
LOUIS VUITTON USA INC

The undersigned, being duly sworn, says on oath that he/she served the SUMMONS AND COMPLAINT in this action by delivering same to: AGENT FOR SERVICE, SAVANNAH POPE PERSONAL SERVICE And leaving with him/her one copy of same at 508 MEETING ST WEST COLUMBIA SC 29169 on the 1 of December, 2020 at 14:15 Hrs. And that Defendant/Respondent is not a member of the U.S. Forces.

Signed


NATHANIEL COLLINS, SERGEANT, LCSD

Sworn to before me on this
2 day of December, 2020


Notary Public for South Carolina
My Commission Expires: 2.25.26

